

1. The Debtor is the owner of a certain residential property located at 416 Johnston Road, Pittsburgh, PA 15241 and further identified as tax parcel 569-R-91 ("Property").
2. The Property has a fair market value of \$470,000 which is based upon an appraisal prepared August 11, 2014, by P. James Zak. True and correct copies of selected pages of appraisal are attached hereto as Exhibit "A" (a full copy of the appraisal may be obtained by contacting undersigned counsel).
3. The Property is encumbered by a first position mortgage in favor of Federal National Mortgage Association as serviced by Seterus, Inc. to secure a claim of \$570,933.
4. The Property is also encumbered by the following liens (collective the "Liens"):

Priority	Creditor	Lien Type	Recording Date and Number	Amount Owed*
2	SunTrust Mortgage Inc.	Mortgage	9/10/2007 B/V 34438, p. 377	97,250.00
3	Internal Revenue Service	Federal Tax Lien	2/09/2010 FTL 10-000349	20,033.83
4	PA Dept. of Revenue	State Tax Lien	10/18/2010 GD 10-019505	8,156.10
5	Whirl Magazine, LLC	Judgment Lien	1/10/2013 GD 13-000777	5,239.14
6	Capital One Bank USA	Judgment Lien	3/01/2013 GD 13-003716	3,897.87

* Per recording data.

5. All of the Liens are totally under-secured. Therefore pursuant to 11 U.S.C. §506 the Debtor is entitled to have the Liens declared null and void and removed from the Property.

WHEREFORE, the Debtor prays your Honorable Court to enter an order declaring liens of all of the Defendants void and removed from the Property and granting the Debtor such other and further relief as is just.

Respectfully submitted,
/s/ Gary W. Short
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